

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CARNAIL JONES

No. 21 CR 222

Judge Seeger

PROTECTIVE ORDER GOVERNING DISCOVERY

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a)(1) and (8), it is hereby ORDERED:

1. Certain materials disclosed or to be disclosed by the government in this case contain particularly sensitive information, including information concerning individuals who are still under federal investigation. These materials shall be plainly marked as “Sensitive” by the government prior to disclosure.

2. Defendant and defendant’s counsel shall not disclose the “Sensitive” materials or their contents directly or indirectly to any person or entity other than persons employed to assist in the defense, persons who are interviewed by defense counsel as potential witnesses, or counsel for potential witnesses (collectively, “authorized persons”). Potential witnesses and their counsel may be shown copies of “Sensitive” materials as necessary to prepare the defense but may not retain copies without prior permission of the Court.

3. Defendant, defendant’s counsel, and authorized persons shall not disclose any notes or records of any kind that they make in relation to the contents of

“Sensitive” materials, other than to authorized persons, and all such notes or records are to be treated in the same manner as the original “Sensitive” materials.

4. Before providing “Sensitive” materials to an authorized person, defense counsel must provide the authorized person with a copy of this Order.


5. Absent prior permission from the Court, material marked as “Sensitive” shall not be included in any public filing with the Court and instead shall be submitted under seal.

6. The restrictions set forth in this Order do not apply to documents that are or become part of the public court record. Further, the restrictions in this Order do not limit defense counsel in the use of the “Sensitive” materials in judicial proceedings in this case (subject to the rules governing the use of the “Sensitive” materials in public filings as set forth above).

7. Upon conclusion of all stages of this case, all of the “Sensitive” materials (and copies made thereof) shall be disposed of in one of three ways (unless otherwise ordered by the Court), namely, they shall be destroyed, returned to the United States, or retained in defense counsel’s case file. In the event that the “Sensitive” materials are retained by defense counsel, the restrictions of this Order shall continue to be in effect for as long as the “Sensitive” materials are so maintained, and the “Sensitive” materials may not be disseminated or used in connection with any other matter without further order of the Court.

8. Nothing contained in this Order shall preclude any party from applying to this Court for further relief or for modification of any provision hereof.

ENTER:

A handwritten signature in black ink, appearing to be 'SCS', is written over a horizontal line.

STEVEN C. SEEGER
United States District Judge

Date: August 27, 2021